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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE MARILYN L. HUFF)

UNITED STATES OF AMERICA,

Plaintiff,

v.

ISMAEL RUBIO-OLMEDA,

Defendant.

CASE NO. 07CR2957-H

DATE: November 26, 2007

TIME: 2:00 P.M.

NOTICE OF MOTIONS AND
MOTIONS TO:

1) COMPEL DISCOVERY;

2) LEAVE TO FILE FURTHER MOTIONS.

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND
GENE LITVINOFF, ASSISTANT UNITED STATES ATTORNEY

PLEASE TAKE NOTICE that on November 26, 2007, at 2:00 p.m., or as soon thereafter as
counsel may be heard, the defendant, Ismael Rubio-Olmeda, by and through his counsel, Erick Guzman and
Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the motions listed below.

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MOTIONS

Ismael Rubio-Olmeda, the defendant in this case, by and through his attorneys Erick Guzman, and Federal Defenders of San Diego, Inc., pursuant to the Fourth, Fifth and Sixth Amendments to the United States Constitution, Fed. R. Crim. P. 12, 16 and 26, and all other applicable statutes, case law and local rules, hereby moves this Court for an order to:

1) Compel discovery/Preserve evidence;

2) Grant leave to file further motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, and any and all other materials that may come to this Court's attention at the time of the hearing on these motions.

Respectfully submitted,

Dated: November 21, 2007

/s/ **ERICK GUZMAN**
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Ismael Rubio-Olmeda
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